DOCKET FILE COPY ORIGINAL

ROSS Engineering

12505-E Starkey Rd.
Largo, FL 34643 USA
Phone: (813) 536-1226
Fax: (813) 535-4248

Setting New Standards In Communications & Navigation

RECEIVED
JUN 01 1993
FCC - MAIL ROOM

RECEIVED
27 May 93
JUN - 1 1993
FEDERAL COMMUNICATIONS COMMISSION

Office of the Secretary
Federal Communications Commission

ORIGINAL

Comment of ROSS ENGINEERING COMPANY (REC) in the Notice of Proposed Rule Making and Notice of Inquiry.

Par 12

Telecommunications requirements needed in the next 10-15 years

As we view the expansion of the Land Mobile telecommunications and the growing public awareness of the many new and enhanced services this growth has provided, we fully expect a demand for these new services in any future VHF Maritime systems that serve this same customer. Certainly competition from the Land Mobile services will continue as long as the Coast Station providers offer outdated manual type service in limited areas. We see a growing need to establish a national VHF Maritime Coast Station Service, operating under an established and agreed upon DSC protocol. These new stations created from existing coast stations and private coast stations could offer services to both the boating community and land mobile users. Services specifically required by the Maritime service, such as safety can be provided. There should also be increased demand for VTS alarm/monitoring functions, fax, packet data networks, privacy, and position locating services. The introduction of the PC into the radio channel has created a host of new services commonly called "advanced message services" such as voice mail, custom information offering, locating service and a host of "Class" type services now available due

Cellular providers do not design their systems to meet the coverage needs of the boaters but rather the needs of the hi density land traffic. Therefore those boaters who may now enjoy cellular service 40-50 miles off shore may no longer have coverage when the cellular systems go to small cells and coverage is reduced to a few miles.

Par 14

Trunking

We support the move towards requiring trunking in the VHF Public/Private coast stations as one of the means to improve spectrum efficiency. We also feel that the commission should require some sort of minimum trunking capability for those public coast stations which utilize more than three correspondence channels. For those coast stations using less than three correspondence channels the commission should require they be automatically interconnected to the telephone network without the requirement for direct manual operator patching. Both of these coast stations could use DSC as the standard protocol. In the event of channel splitting where additional channels are derived, these additional channels could be assigned only to those existing coast stations that employ some sort of trunking mode.

Par 15

Digital Selective Calling

The Commission should require minimum DSC capability for all marine radios and mandate the DSC protocol as the only selective calling technique to be used in the VHF public coast stations. DSC has already been established by international organizations such as the ITU and IMO as the only recognized selective calling format for maritime communications worldwide. The Commission should not allow the establishment of "Private systems" on the Public correspondence channels. All public coast stations should remain "open" to all users without the requirement of obtaining any special equipment or special entry instructions from a group of or from a single coast station operator. Mandating the DSC protocol as the only protocol for automatic interconnection with the telephone network will provide the "open network".
We agree that the cost of the mobile radio may at first increase for those units capable of the automatic DSC interconnection over those units that are simply "add on" devices, but certainly these costs will follow the path of the cellular units once system usage rates increase and more than one or two manufacturers produce DSC units. DSC is already a mandatory requirement for radios carried to meet GMDSS requirements, and manufactures will certainly be producing full DSC radios in any event.

If there is ever any hope for establishment of a national VHF Coast station system in the US it will come about only thru the establishment of a mandated system protocol.

Par 21

Private carriers

Allowing Private coast stations to become private carriers and pre-empting them from the State and Local governments jurisdiction may put these private stations in direct competition with existing Public coast stations. At present Private Coast stations serve only the operational and business needs of vessels and are not open to Public correspondence. Giving these limited stations "Private Carrier" status could allow these stations to provide service "for Profit" and interconnect directly to the telephone network. It may prove almost impossible to control the type of "permissible communications" when such stations are directly connected and operating for profit. It may better serve the general marine community to have both the "Private coast" and the "Public coast" stations reclassified into one service. This new class of coast station would combine both VHF Private and Public station frequencies. We believe the Commission should allow both the private and the public VHF coast stations to serve all end users for profit and that these stations be called "Maritime VHF Coast Stations". These "Maritime VHF Coast Stations" should be assigned exclusive use of assigned correspondence frequencies within 150 miles of any co-channel station unless that station is part of the same system. They should be allowed to provide service to land mobile users on a secondary basis via the DSC protocol where priority is given to the Maritime user. These coast stations that have installed the DSC CH-70 should be required to "pass on" to the USCG the GMDSS automatic distress traffic information. The USCG would then decide what to do with this information.

Par 27

Spectrum

We support the narrow-band FM (NBFM) approach in the VHF Private and Public coast frequencies. Splitting these 25KHz channels to 12.5KHz with a view toward possible splitting again in the future would provide the needed channels for new trunked systems serving both the off-shore boaters and land mobiles. This type of channel splitting can be done in the same manner as what is now being considered by the Private Land Mobile Service under PR 92-235. Adjacent channels can also be located not closer that 10 miles separation. We further believe that channel assignments and provisions for exclusivity can best be administered thru "Radio Frequency Service Coordinators"

Par 18

Proposed Rules that Require DSC

We agree with the USCG that unless we require a minimum DSC capability for ALL VHF marine radios, marine collisions will increase as a direct result of reduced Ch 16 watch. All new VHF radios installed after 1997 should contain the capability as suggested in the matrix under VHF SC101. This should include all add-on devices. We feel that requiring ALL marine radios to have these minimum capabilities will increase the coast of the radios by approximately $50 to $75 per unit while requiring only certain radios be equipped will increase the per until coast to manufacture a smaller number by about twice the amount.

Par 37

Private Land Use of Marine Frequencies

We oppose the primary allocation of VHF Public Coast Station Frequencies to I/LT service providers. Rather, we would support the use of these frequencies by Public Coast Stations to